

Message

From: Graves, Brian [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=05450FC1F13149E6B2012C497CC6963A-GRAVES, BRIAN]
Sent: 3/5/2020 2:24:58 PM
To: Laura Sorey [Laura.Sorey@LA.GOV]; McEvoy, Molly [mcevoy.molly@epa.gov]
CC: Harvill, Jana [Harvill.Jana@epa.gov]
Subject: RE: Crosswalk Question

Laura,

Can you please copy Jana Harvill on these Class VI Primacy emails. She is the LDNR oversight person and the "point" person for the process with LA.

Thanks,

Brian

From: Laura Sorey <Laura.Sorey@LA.GOV>
Sent: Thursday, March 5, 2020 8:15 AM
To: McEvoy, Molly <mcevoy.molly@epa.gov>
Cc: Graves, Brian <Graves.Brian@epa.gov>
Subject: Crosswalk Question

Hey Molly,

After our conversation yesterday, I realized that I was conflating two different issues and then asking the wrong question. So this is the revised attempt.

I'm looking **40 CFR 144.41(g)** on the crosswalk. It references amending a "plugging and abandonment plan which has been updated under **40 CFR 144.52(a)(6)**." §144.52(a)(6) is referenced separately as a federal requirement in the full primacy crosswalk but isn't included as a requirement in the Director's Manual version.

(6) After a cessation of operations of two years the owner or operator shall plug and abandon the well in accordance with the plan unless he:
(i) Provides notice to the Regional Administrator;
(ii) Describes actions or procedures, satisfactory to the Regional Administrator, that the owner or operator will take to ensure that the well will not endanger USDWs during the period of temporary abandonment. These actions and procedures shall include compliance with the technical requirements applicable to active injection wells unless waived by the Regional Administrator.

Normally I would think that the plan referenced in §144.41(g) would be updated with respect to the actual injection well plugging section **40 CFR 146.92** rather than the above subsection. Is that reasonable or am I overlooking something?

Thanks,
Laura

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